

Federal Defenders
OF NEW YORK, INC. MEMO ENDORSED

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601
Tel: (914) 428-7124 Fax: (914) 997-6872

David E. Patton
Executive Director
and Attorney-in-Chief

Susanne Brody
Attorney-in-Charge
White Plains

April 19, 2021

Via E-mail and ECF

The Honorable Kenneth M. Karas
District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

CARES PETITION

**Re: United States v. Juan Navarro
20 Cr. 502(KMK)**

Dear Judge Karas:

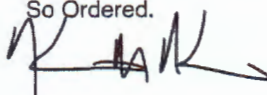
I am writing on behalf of Mr. Juan Navarro's upcoming withdrawal of his not guilty plea and his entry of a guilty plea, which is currently scheduled to occur on Wednesday, April 21, 2021 at 11:00, pending this Court's referral to the Magistrate-Judge and the granting of this Petition. In light of the COVID-19 pandemic and Judge McMahon's order regarding Court operations, I am writing to ask that Mr. Navarro be permitted to be enter his guilty plea remotely via videoconference or teleconference. Mr. Navarro was presented on a Complaint on July 31, 2020. On August 5, 2020 he was released on bail and has been in full compliance with his bail conditions. On September 30, 2020 he was arraigned on an Indictment. On January 31, 2021 the government sent a Plea Agreement and a Superseding Information. The Information charges a violation of Title 21 USC 841(b)(1)(B), a five year mandatory minimum sentence.

A remote plea is appropriate under the Cares Act because further delay would cause serious harm to the interests of justice. Mr. Navarro has an interest in resolving this case in the most expeditious manner as possible. He understands he has an absolute right to be present in Court for this and for all court proceedings and waives that right. He further understands he has an absolute right to enter his plea before this Court but consents to proceed before the Magistrate-Judge. Thank you for your consideration.

Respectfully submitted,
Susanne Brody
Susanne Brody

Granted. The plea may proceed remotely, as further delay to allow for an in-person proceeding would cause serious harm to the interests of justice under the CARES Act.

So Ordered.


4/19/21

cc: T. Josiah Pertz, AUSA

Mr. Juan Navarro